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AR201-13505

2001 DEC 28 PM 2:13

Surface Chemistry

December 17, 2001

Hon. Christine **Todd** Whitman, Administrator
United States Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

Dear Ms. Whitman:

RE: Removal of Chemicals **from** HPVC Commitment

Akzo Nobel Surface Chemistry LLC participates in the High Production Volume Chemicals (**HPVC**) Industry Challenge Program as a member of the SDA-managed Amine Oxides Consortium. The purpose of this letter is to support the Amine Oxides Consortium's request that EPA remove the following material **from** the HPVC Challenge List as this chemical is no longer HPVC:

CAS No. 61791477 (Ethanol, 2,2'-iminobis-N-coco alkyl derivs., N-oxides)

Akzo Nobel Surface Chemistry LLC is unaware of any company or companies that have reported this material in the 1994 or 1998 **IUR** reporting cycles in quantities sufficient to achieve the 1,000,000 pound aggregate volume threshold necessary for identification as a HPVC. The **Amines Oxides Consortium** also is not aware of any company or companies that plan to produce or import the material in quantities sufficient to achieve the 1,000,000-pound aggregate volume in the **future**.

The Consortium make this assertion based on the knowledge of the companies participating in the **Amines Oxides Consortium**. Furthermore, this conclusion is supported by EPA's own publicly available information. Specifically, EPA's recently released 1998 **IUR** non-CBI volume ranges reports this CAS number as having been reported between 10,000-500,000 pounds, which is well below the production volume necessary for identifying the material as HPVC.

Consequently, since the reported manufacture and/or importation of these chemicals under the **IUR** in the last two reporting cycles is well below the 1,000,000 pound aggregate volume, the Consortium requests that the chemical identified above be removed **from** the HPVC Challenge List for the reason that it is "no longer HPVC."

Akzo Nobel Surface Chemistry LLC appreciates your consideration and your prompt response to this issue will be greatly appreciated. Please let me know if I can be of any assistance.

Sincerely,

Donna M **Hillebold**
Regulatory Affairs Manager

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